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ABSTRACT

This paper presents a literature review examining research that addresses the issue of freedom of expression as it relates to instructional decision-making for teachers in K-12 grades. The paper proposes to connect two sub-fields in speech communication: instructional communication and freedom of expression studies. In surveying the research, however, the paper examines numerous sources outside these fields. The paper is categorized according to five major types of research that appear: "surveys of court opinions," "critiques of court opinions," "trends in restricting freedom of expression," "types of restrictions of teachers' freedom of expression," and "what teachers should know about freedom of expression." The paper concludes that research in this area is hampered by the lack of communication among the various disciplines, such as law and speech communication. Furthermore, the paper finds that studies examining how teachers' freedom of expression enhances or detracts from teaching effectiveness have not been undertaken. Contains 64 references. (Author/RS)

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Studies of Teachers' Decision-Making and Their Freedom of Expression

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Studies of Teachers' Decision-Making

and Their Freedom of Expression

Abstract

This paper is a literature review examining research that addresses the issue of freedom of expression as it relates to instructional decision-making for teachers in K-12 grades.

The review proposes to connect two sub-fields in speech communication: instructional communication and freedom of expression studies. In surveying the research, however, numerous sources outside of these fields are examined. The review is categorized according to five major types of research that appear: "Surveys of Court Opinions," "Critiques of Court Opinions," "Trends in Restricting Freedom of Expression," "Types of Restrictions of Teachers' Freedom of Expression," and "What Teachers Should Know about Freedom of Expression."

The review concludes that research in this area is hampered by the lack of communication between the various disciplines, such as law and speech communication. Furthermore, the review finds that studies examining how teachers' freedom of expression enhances or detracts from teaching effectiveness have not been undertaken. Such studies may provide a useful research agenda in instructional communication.

Studies of Teachers' Decision-Making and Their Freedom of Expression

Often, the relationship between the discipline of speech communication and the sub-field of instructional communication is overlooked. Sprague (1989) has observed that the "dialogue has diminished" between speech communication and instructional communication because "instructional communication has . . . taken such a highly technical turn" (p. 2). This review of literature shows that one area in which the dialogue between speech communication and instructional communication needs to be increased is the area of speech communication that investigates the rights attributed to the First Amendment of the U.S. Constitution and teachers' freedom of expression. This area has long been an interest of rhetorical studies, and surfaces in articles in the Speech Communication Association publication *Free Speech Yearbook* and in a 1987 issue of *Communication Education*, which focuses on censorship in speech education.

This review examines studies that relate freedom of expression to teachers' decision making. Shulman (1986) asserts that teacher decision making, "deriving from roots in curriculum research and teacher education . . ., has examined teachers' practical knowledge" (p. 25). This narrowing of the topic to teachers' decision making offers three advantages for a review pertaining to instruction and the freedom of expression. The first advantage, articulated by Shulman (1986) and Fenstermacher (1978), is that "proper examination and

reform of teacher education will be contingent upon progress in understanding teacher thought" (Shulman, 1986, p. 26). Teachers' understanding of their own freedom of expression is certainly a parameter of such "teacher thought." The second advantage is that the teacher, though not the only influence in the classroom, is of prime importance as a behavioral model for the entire class and is a salient link between the students in the classroom and the policies of the classroom's societal context, including the school district and the state. In this respect, studies in teacher decision making and the freedom of expression are part of "a fewer number of studies investigating larger instructional environments" (Staton, 1989, p. 365). The third advantage is that a focus on teacher decision making and the freedom of expression leads to categories that may be comparable for studies involving students and their freedom of expression.

The goal of this review is to categorize research that pertains to teacher decision making and the freedom of expression in grades K-12. This paper includes: a) an inductively-derived categorization of research, b) a review of that research, and c) suggested directions for future research.

Definitions

Freedom of expression is said to emanate from the Bill of Rights. The First Amendment says, in part, that "Congress shall make no law . . . abridging the freedom of speech, or of the press" (quoted in Haiman, 1981, p. 8). This restriction on the powers of "congress"

has since been broadened to restrict the powers of state and local governments by applying the Fourteenth Amendment. Coincidentally, a curricular dispute was settled in the 1943 Supreme Court decision, *West Virginia Board of Education v. Barnette*, that broadened the First Amendment through the Fourteenth by denying the authority of a school board to enforce a daily pledge of allegiance.

Freedom of expression has, of course, been defined in a variety of ways and just where the definition applies and where it does not is part of the controversy that necessitates judicial rulings. Nevertheless, a general definition is offered by the First Amendment scholar Thomas Emerson, for whom freedom of expression

> includes the right to form and hold beliefs and opinions on any subject, and to communicate ideas opinions, and information through any medium--in speech, writing, music, art, or in other ways. To some extent it involves the right to remain silent. From the obverse side it includes the right to hear the views of others and to listen to their version of the facts. It encompasses the right to inquire and, to a degree, the right of access to information. As a necessary corollary, it embraces the right to assemble and to form associations, that is, to combine with others in joint expression. (quoted in Haiman, 1981, p. 22)

This definition is most germane to an article in the field of instructional communication, because with it freedom of expression includes the right to communicate as well as to think, to "hold beliefs and opinions." Thus Emerson's definition embraces not only the varied communicative strategies of instructors but also the

cognitive and affective domains of learning. Moreover, since Emerson's definition includes the "right to assemble" as a corollary, it applies to the instructional settings occurring in public schools in which groups of students, and occasionally teachers, engage in "joint expression."

At all levels, the courts must necessarily make decisions regarding the freedom of expression. Therefore, when this literature review uses the term "courts," that may be taken to represent all court levels in the United States, from the state courts, through the Federal District and Appellate courts, to the Supreme Court. Thus, references to individual cases will refer to a particular ruling in one of these four levels.

Teacher decision making, as stated previously, involves the "practical knowledge" of public school teachers of grades K-12 as it applies to the choices they make for their instructional setting, the classroom. Although the issue of freedom of expression applies to teachers at the college level, this paper focuses on K-12 teachers because their students are considerably different from those at colleges and universities. Their students are less mature and so their freedom of expression is generally considered apart from that of adults. Furthermore, since their attendance in school is required up to a certain age, they have been considered by the court to be a "captive audience." These differences between the students of public school teachers and other types of students have been summarized by Gordon (1984):

> Public school students are the quintessential captive audience: their attendance in school is mandatory; an elaborate system of rewards and punishments encourages them

> to accept the truth of the communications; the speaker is a figure of great authority; and they are not mature enough to subject the communications to critical evaluation. (p. 541)

Finally, this study's focus on public school teachers is intended to further problematize the area of "freedom of expression" because as employees of the state, public school teachers' ability to communicate is sometimes subjected to governmental constraints. For example, Bosmajian (1991) notes that *Rust v. Sullivan*, a recent Supreme Court decision regarding family planning clinics, could be "a precedent for future suppression of the speech of persons identified with groups receiving public funds" (p. 309).

Narrowing teachers' decision making to that which occurs in the classroom has necessitated a focus on research that relates to the development and presentation of "curriculum." Curriculum, in this capacity includes both the educational goals proposed by the school authorities and the educational goals and objectives within an individual classroom. In this latter category, curriculum pertains both to the instructional materials and the instructional methods used to realize these goals and objectives. When relevant and possible, however, this paper distinguishes between instructional materials and methods.

Procedures

This literature review followed a five step method in gathering data. First, indices were searched for potentially relevant articles. Second, a computerized search augmented this selection of

articles. Third, potentially relevant books were searched through the University of Washington library's computerized subject and title index. Fourth, these books and article were further augmented by culling important references from their bibliographies. Fifth, articles that, on inspection, did not relate to the parameters of this literature review were eliminated.

The *Education Index* was searched for the years from 1981 to 1991 using the descriptors "Academic Freedom," "Censorship," "Information--Freedom of," "Teachers--Civil Rights," and "U.S. Constitution--1st - 10th Amendments." The *Current Index to Journals in Education* was searched for the years from 1986-1991 using the descriptor "Academic Freedom" and "Censorship." In both cases, articles were selected whose titles or abstracts suggested an emphasis on "curriculum" as defined above. The *ERIC* database was searched using the descriptors "Academic Freedom," "Freedom of Expression," and "Censorship." These descriptors were narrowed by culling those sources that regarded "teachers" and "curriculum." Sources that turned up through this search but appeared to emphasize higher education, or the censorship of libraries rather than classrooms, were not selected. Also not selected were sources in publications that had a focus other than scholarly research, e.g.: *U.S.A. Today* and *The Chronicle of Higher Education*. Further, this search of articles attempted to exclude scholarly articles which would not embody research; thus, symposia and short works (less than 2 pages) that lacked bibliographies were not included. The book search was conducted by examining titles and subject headings that included "Freedom of Speech," "Academic Freedom," "Freedom of Expression," and "Teachers' Rights." The fourth

stage of this research procedure, examining the bibliographies of important works, was particularly crucial because the education indices cited above only offered one article from a journal devoted to reviewing general law. This step, however, revealed an entire line of research currently conducted on this topic in legal journals, so if this literature review procedure were to be revised, a helpful change would be to include a search of a legal index. Finally, a number of articles found through this research procedure had no direct bearing on the issues of teacher-decision making. For example, a number of articles dealt solely with the issue of school library holdings. Such articles were eliminated from this survey.

Current Research

The sources surveyed in this review cover a broad range of perspectives on freedom of expression and teacher decision making. To begin with, the research is being conducted in several disciplines. Of course, legal scholars, including court clerks, judges, and professors have conducted research in this topic. Education scholars as well as scholars in Educational Administration have contributed to the research on this topic. Scholars of English literature have conducted research in this area because literature so often becomes the target of efforts at censorship. Scholars in social science, particularly social science education, have considered this topic since freedom of expression has significance for the content of social science teachers in public education. Finally, scholars in speech communication, as observed above, have written on this topic.

As yet, there has been no codified effort to survey the work in these diverse disciplines, yet in relation to this topic, all of this scholarship can make contributions. The most parsimonious division of this research was to explicate various issues that surfaced. Those five divisions include "Surveys of Court Opinions," "Critiques of Court Opinions," "Trends in Restricting Freedom of Expression," "Types of Restrictions of Teachers' Freedom of Expression," and "What Teachers Should Know about Freedom of Expression." A particular article may appear under one or more of these issues.

Surveys of Court Opinions

"Freedom of expression" is a contested area and is subject to the interpretation of the courts; therefore, judicial opinions are an obvious place to start looking for such information. Numerous cases are particularly concerned with teacher decision making as it relates to the "freedom of expression." Some of these judicial opinions focus on the conduct of teachers outside of their classrooms but many consider what sorts of instructional methods or materials may be adopted in public school. These decisions *per se*, while relevant to this topic, were not covered by the research procedure described above. Nevertheless, this study found several anthologies of court decisions that are designed for an audience of teachers and educators. Morris' *The Constitution and American Public Education* (1989) is a two-volume legal reference of judicial interpretations of the constitution relating to all aspects of public education. A much more focused collection is a series called "The First Amendment in the

Classroom" edited by Bosmajian. Of particular relevance to this topic are *The Freedom to Read* (1987) and *Academic Freedom* (1989) which contain summaries and extracts of cases in which teachers' instructional methods or materials were challenged by administrators, parents of students, and sometimes students themselves.

Articles are unable to give such comprehensive coverage; however, some outline the courts' opinions on issues that have come under judicial scrutiny. For example, Lehr (1985) has summarized major court cases to "provide. . . some sense of the extent to which teachers may legitimately select course content and teaching methods" (p. 42). Turner-Egner (1989) has provided a similar survey that starts with the major issues rather than the major cases. Janes (1990) has collected the salient passages from cases that impact on the teaching of ethics and values. Zirkel and Gluckman (1988) have focused on two decisions and their definitions of "curriculum." Jorstad (1989) examines the questions left unresolved by the courts and then seeks to explicate a distinction between "compulsive education" and "being informed" (p. 5). One of the most comprehensive survey articles is Kemerar and Hirsh (1981), in which the court decisions on teachers' freedom of expression are divided into those which tend to restrict teachers' choices and those which do not.

To summarize, these surveys provide an efficient introduction to the body of court-made, or common, law that has a direct bearing upon teachers' authority to exercise freedom of expression. Nevertheless, the variety of issues and viewpoints covered in these court opinions is bewildering.

Critiques of Court Opinions

Many articles summarize court opinions, as those in the previous category, except that these articles use these summaries as steps in arguments critiquing the judgment of the court. These criticisms are generally divided on the issue of who should authorize public school curricula.

The writers of these articles consider one aim of education being the inculcation of students, that is, training them in certain values and attitudes necessary for the citizens of a functioning democracy. In these cases, curriculum is to be mostly, if not entirely, the responsibility of the local school board and the state. Goldstein (1976) and Smalls (1983) argue that teachers are subject to the choices of the local school board because the concept of "academic freedom" does not apply to public schools. Goldstein (1976) and Stewart (1989) assert that curriculum matters left to the school board are overseen by the local political process which is "the proper distribution of decision making power" (Stewart, 1989, p. 61). Orleans (1981) sees that curriculum control should be in the hands of the "elected officials" (p. 2). Objectionable curricula must be examined as a possible infringement of the fourteenth amendment since the first amendment provides "no standard" (p. 8).

Other critics argue that the parents should have a greater role in the development or approval of curriculum. Breyer (1991) argues that the school boards and governing authorities have been given too much power and that parents should retain the right to have their children avoid particular portions of the curriculum. Breyer's

viewpoint is opposite of Orleans (1981) who sees "[a] parent's right to have his child excused from exposure to an objectionable text or curricular element is effectively a personal retraction of that delegation [given to the school board]" (p. 8). Interestingly, neither of these writers see the teacher as having any role in the selection or control of the curricular material. Arons (1976) says that the state must "maintain a neutral position toward parents' educational choice whenever values or beliefs are at stake" (p. 97).

Some critics of court opinions, by contrast, argue that teacher autonomy, the teacher's right to choose appropriate materials and methods, is essential to public education. These scholars refute the "inculcative" function invested in school boards as being too restrictive on the classroom and the rights of students or teachers. Van Geel (1983) argues that the state should not assume the responsibility for inculcating its students simply because it cannot. He examines the scholarly work from the field of education that is cited in some court cases and systematically shows how these citations do not provide empirical support for the opinions which rest on the "inculcative" ability of schools. Gordon (1984) argues that the essential factor in public education is not <u>what</u> is taught, but <u>how</u> it is taught. He contrasts a "directive" method of teaching with one that is "discursive" and observes that the "discursive method" is "compatible with first amendment principles" (p. 556).

To summarize, critiques of court opinions include critiques who would prefer more state and local control over teacher decision-making, and those who prefer more autonomy. Teachers who plan to defend their own choices need a knowledge of the arguments from both sides.

Trends in Restricting of Freedom of Expression

Numerous writers in the areo of freedom of expression begin with the claim that challenges of methods and materials which amounted to censorship in the public school system were on the increase. A number of these writers simply asserted the claim without any apparent support (Jalongo & Creany, 1991, p. 145; Mackay, 1982, p. 16; Moffett, 1990, p. 6). Many writers posit a cause-effect relationship of some sort as justification for this claim. Tanner (1989) suggests that stresses in the "social fabric" are manifested in censorship challenges (p. 182). Some writers attribute the increased challenges to school methods and materials to better organized parent groups, particularly those on the far right (Bruwelheide, 1987; Palmer, 1982). Goldstein (1976) sees an increase as part of a larger increase in overall litigation in American society (p. 1293). Van Geel (1983) suggests the increase is the result of court opinions which promise greater success to citizen groups that pursue such challenges (pp. 199-200).

Some writers cite surveys that indicate censorship is on the increase. Gerke (1983), for example, cites a survey by the National Council of the Teachers of English (NCTE) and another by the combined

Association of American Publishers, the American Library Association, and the Association for Supervision and Curriculum Development (AAP-ALA-ASCD). Hansen (1987) cites a survey conducted by Buress in 1977 (p. 124). Taylor (1982), however, looks at the data of three surveys--including two cited by the above writers (the NCTE and the AAP-ALA-ASCD)--and finds various errors, including the use of anecdotal evidence, a lack of systematic selection and of follow-up. He concludes that it is "impossible to assert from the data of any of these three sources that censorship pressures are increasing either in frequency or intensity" (p. 31).

In summary, the question of whether censorship is on the rise is contested, yet most of these articles suggest that it is. In any case, teachers can benefit from an awareness that potential challenges to their teaching methods and materials are influenced by broad factors such as demographics and economics.

Types of Restrictions on Teachers' Freedom of Expression

Originally, this review of literature intended to focus on instructional methods rather than materials, but preliminary research found it impossible to make that distinction clearly because of the overriding influence of textbooks, as the instructional material, on teacher methods. Hart (1983) and Lee (1988) posit gradational steps in the restrictions on teachers' freedom of expression which start with the textbooks but which are finally "directed at an anchor point of today's education--learning techniques of problem-solving and higher thinking skills by analyzing, hypothesizing and interpreting"

(Lee, 1988, p. 70). Hulsizer (1987) suggests that the restrictions ultimately diminish choices that teachers have, saying "[t]he chilling effect on texts may spill over into teaching . . . with teachers avoiding controversial subjects and shying away from activities such as open ended questions, debate, and role play" (p. 16). Gordon (1984) argues that the link between texts and methods is more pronounced in the elementary level teacher's "almost total reliance on teaching methods suggested in the teacher's guides" (p. 548).

Restrictions on teachers' freedom of expression often come from two groups: educational administrators and parents dissatisfied with their local schools choices. educational administrators tend to "mandate" teacher choices, while the parents tend to "attack" curriculum decisions after they have been made (Sproule, 1987, p. 317). Some scholars have noticed differences in public perceptions about the restrictions imposed by administrators as opposed to parents. Moffett (1990) observes that curricular control by local preachers is "called censorship [but when] sleek academics do it, it's called 'cultural literacy'" (11). Lehr (1987) distinguishes between administrative "guidelines" and "censorship" saying that censorship "seeks to exclude" but that guidelines "include" materials and methods (p. 655). Gordon (1984) provides an interesting survey of the state enforced control of students by examining the requirements of all 50 state constitutions and even finds that some states "stress more moralistic benefits of education: 'virtue,' 'morality,' 'religion,' 'patriotism,' and 'integrity' are all singled out as being necessary to good government" (p. 527). Gordon's study also offers the most in-depth discussion of the restrictions on freedom of expression created

by statewide textbook selection policies. Because of the requirements stipulated in Texas and California, "two states . . . publishers cannot afford to ignore," he argues that "modern textbooks tend to be dull, bland, and noncontroversial" (p. 548, p. 548fn). For example, major biology textbooks avoided the term "evolution" until the 1960's.

Some researchers have focused on the conflicts between teachers and parents. Taylor (1982) claims that many scholars "see the schools and their communities in an adversarial relationship" (p. 31). Small (1979) argues against the tendency to "dismiss the censors as strange and isolated 'kooks'" (p. 59). Mackey (1982), who conducted a random survey, found that "parents in our sample objected to the lack of communication [between schools and parents]" (p. 17). Donelson (1987) has described the six questions he has most often encountered when confronted by citizens groups that were dissatisfied with particular elements of the curriculum. Some scholars mention specific groups that frequently spearhead drives to restrict the curriculum. Tanner (1989), for example, observes that these critics cut across political categories of right-wing, left-wing, and moderate. The most extensive list of citizen groups that attempt to restrict teachers' freedom of expression found in this literature review is provided by the Washington Coalition Against Censorship (1989). The most extensive research on the *views* of parents objecting to school curriculum was conducted by Moffett (1988). His book-length interpretive study, *Storm in the Mountains*, contains interviews, official documents, and narrative descriptions reporting on the sometimes violent textbook protests which occurred in Kanawha County, West Virginia.

When curricular conflicts are not settled locally among the teachers, the administrators or the parents, "it is the job of the courts to balance the legitimate rights in conflict and determine when to protect and when to limit freedom of expression" (Fischer et al, 1991, p. 121). Rubin and Greenhouse (1984) state

> Although the Supreme Court has yet to confront directly the issue of a teacher's freedom of speech in the classroom, the lower federal courts . . . have accorded a measure of constitutional protection to classroom expression by teachers in the grade and secondary schools. (p. 116)

To qualify for this "measure of constitutional protection," a number of writers (see below) have suggested guidelines that teachers might follow in choosing instructional methods and materials.

To summarize, restrictions on teachers' freedom of expression take shape in a variety of forms. Legally, teachers may be bound by rules at the state, and local levels of government. Administrations may have set up district-wide policies and even employment contracts sometimes specifically constrain freedom of expression. All such rules, though, are initially promulgated in an attempt to codify "community" standards. Thus, as the next section suggests, awareness of and contact with, local communities is essential for teachers defending their freedom of expression.

What Teachers Should Know about Freedom of Expression

Many of the articles surveyed offered recommendations to teachers to plan ahead even though they may be unaware of any threats to their discretion in choosing instructional materials or methods. A handful

of these articles were directed at preservice teachers. These articles focused on perceived gaps in teacher education. Gerlach (1979) asserts that "most teacher training in law studies education has occurred *outside* the regular courses of our colleges and universities" (p. 31). Concentrating on a similar gap, Sametz (1982) argues that teacher certification programs should require a broader knowledge of the law, stating that "teachers would be aware of children's rights and their rights in relation to their students" (p. 263). Watson and Snide (1981) tested "the impact of an education experience devoted to censorship on the selection behavior of library science and education majors" (p. 272). The results showed that such education can be an empowering experience for teachers because the participants' "reduction in anxiety and fear" helped "eliminate acts of self-censorship when selecting books for children's reading" (p. 276). Conversely, another study by Sametz, McLoughlin, and Streib (1983) showed that the students in education programs which they studied were not receiving such empowering experiences. They tested sophomores and graduating seniors on their knowledge of 11 areas involving teachers and the law, which included first amendment rights. Their hypothesis "that seniors would be more knowledgeable than sophomores was not supported" (p. 10).

Other scholars have focused on inservice teachers arguing that they need to plan ahead so that their instructional methods and materials will not be challenged in the future (Donelson, 1982; Carroll, 1987; Janes, 1990, and Weil, 1988). This argument to plan ahead is directed at administrators as well as teachers. For example, Jenkinson (1985) "examined 222 sets of policies and procedures for

school systems in Indiana [and] discovered that less that 15% of the school systems had both policies and procedures that protected intellectual freedom" (p. 32). Many of these scholars have codified their advice into a multi-step procedure the teacher can adopt or that the school board can require or recommend (Cox, 1977; Bruwelheide, 1987; Donelson, 1979; Jamieson, 1987; Jenkinson, 1985; Lee, 1988; Mahon, 1981; Palmer, 1982; Shugert, 1979; Turner-Egner, 1989; Washington Coalition Against Censorship, 1989). Turner-Egner's list provides a basic sampling of these multi-step procedures. She recommends that

> 1) Administrators should explain the limits on the selection of materials and methods and any prior approval requirements . . .
>
> 2) Teachers should become familiar with requirements and school board policies . . .
>
> 3) When uncertain . . . teachers should seek administrative approval . . .
>
> 4) Teachers should evaluate lesson plans in the light of the considerations [of effectiveness and appropriateness] (p. 377).

Many scholars have augmented these recommendations. Donelson (1979) and Shugert (1979) suggest that teachers should write out rationales for their teaching materials and methods in advance. Others recommend that teachers and school administrators should develop community support for their curriculum (Cox, 1977; Donelson, 1979; Mahon, 1981, and Palmer, 1982). Jenkinson (1985) and Donelson (1987) urge that teachers become acquainted with the publications of the groups that

protest curriculum decisions. Lee (1988) advocates that teachers and administrators should "stand together" (p. 70). Sacken (1989), on the other hand, encourages teachers to be wary of administrator's choices since "[l]ocal boards have been the usual forum for attempts by parents and community groups to control or limit curricular choice" (p. 235). He advocates a collective bargaining process in which teachers could regain control over curricular choice but still be careful to employ some sort of standardized tests to assure the public that learning objectives are being met.

In summary, the issue of what teachers should know about freedom of expression first involves both preservice and inservice teacher education. Nevertheless, teachers with an awareness of the legal issues need to prepare their lessons as though their freedom of expression might be challenged. This preparation involves a rationale for the materials and methods of teaching, an awareness of administrative standards (sometimes including prior administrative approval), and efforts at gathering community support.

Conclusion

After completing this literature review, the researcher is struck by the differences regarding the contributions made by various disciplines to research on teacher decision making and the freedom of expression. Although the types of issues identified found in this review are interrelated, they have been studied in isolation. For example, the criticism of court cases has remained largely the effort of legal scholars with some attention from speech communication

scholars, particularly those scholars involved in rhetorical studies. Meanwhile, the work on inservice guidelines to avoid restrictions on teachers' freedom of expression has been pursued primarily by scholars in English and in Education Administration. Similarly, research on preservice instruction of teachers and the law has been conducted by mainly by scholars in education.

The result of this isolation, is that these areas of research continue generally uninformed of progress in the related areas and consequently overlook relevant research for outdated assumptions about instruction or communication. To be sure, this review found laudable efforts of scholars to examine work outside of their familiar discipline. Van Geel (1983) and Gordon (1984) are two notable examples of legal research, for instance, that take an in depth look into the educational process. But even those works are flawed by the lack of contact between the disciplines of education and of speech communication. A testimony to that oversight is Gordon's citation of Shannon and Weaver's 1949 monograph, the only reference in any of the legal research to the field of speech communication (p. 539fn.). The blame for this lamentable lack of contact between the speech communication and other disciplines cannot be attributed only to those other disciplines. If the judges and theorists of education and law are still presuming a linear model of communication in the instructional setting, then certainly scholars in speech communication need to work harder to have their research accepted by a broader audience.

Furthermore, this review found that there is a problem of isolation *within* the field of speech communication. Two salient

research divisions, freedom of expression and instructional communication studies, were found to have no contact. No studies incorporate the insights of research in public address with current knowledge of classroom communication. Studies that combined the two divisions could broach a number of research questions that remain untouched in this review: Does the exercise of freedom of expression by the teacher make for more effective instruction? Does the exercise of freedom of expression by the teacher provide students with the model of an empowered citizen? Does the exercise of freedom of expression by the teacher suit a multi-cultural class? Does the exercise of freedom of expression by the teacher lead to inculcation or even propaganda, or does it lead to enhanced critical-thinking skills? Such questions could be usefully asked of other participants in the instructional setting: the students, the administrators, the parents.

Those questions would get at the communication issues underlying the legal and administrative restrictions on teachers' freedom of expression. They are the sort of questions ideally suited to a research program in instructional communication. Obviously, such a research agenda could use both empirical and interpretivist frameworks. And it could not arrive at answers easily. Currently, however, the opportunity to do such research remains ignored even though judges--as shown by van Geel (1983), Gordon (1984)--are willing to look to professional studies to make better decisions about what teachers may and may not do in the classroom.

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